

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS STIREWALT TO INTERROGATORIES OF
PITNEY BOWES, INC.
(PB/USPS-T3-1-2)

The United States Postal Service hereby provides the responses of witness Stirewalt to the following interrogatories of Pitney Bowes, Inc.: PB/USPS-T3-1-2, filed on October 26, 1998.

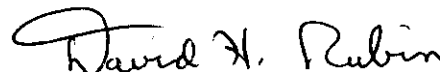
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

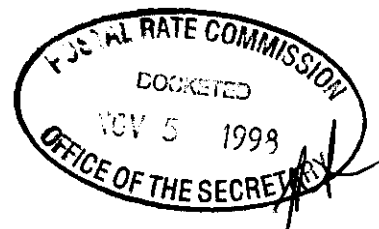
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



David H. Rubin

475 L'Enfant Plaza West, S.W.
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November 5, 1998



RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS STIREWALT
TO INTERROGATORY OF PITNEY BOWES
REDIRECTED FROM WITNESS SECKAR

PB/USPS-T3-1 Is any or all of the software to be employed during the experimental period at the San Mateo facility proprietary to the Postal Service (written by or for the Postal Service) as opposed to off-the-shelf software?

- a. If your answer was in the affirmative, identify where in Attachment 1 to Library Reference USPS-LR-1/MC98-1, the costs of developing that proprietary software are reflected.
- b. If any of the San Mateo MOL-related software is off-the-shelf and not identified in the Stirewalt Library Reference-1, please identify that software by brand name and disclose where in Attachment to the Library Reference the costs of it are reflected.

RESPONSE

Yes. Proprietary software is being developed for the Mailing Online experiment.

- a. An estimated cost for software development is included in witness Seckar's testimony in Exhibit A, page 26, as "System Developer" costs, rather than in Attachment 1 of USPS-LR-1/MC98-1.
- b. I understand that the MOL system for the experiment is now being determined; thus, I am unable to identify any software or provide its costs at this time.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS STIREWALT
TO INTERROGATORY OF PITNEY BOWES
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PB/USPS-T3-2 Please answer the questions posed in Interrogatory 1 above with respect to any software that the Postal Service will make available to its contract printers at the sites of their facilities.

RESPONSE

Please see my response to PB/USPS-T3-1(b) above.

DECLARATION

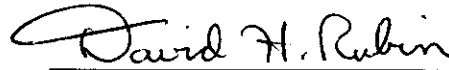
I, Daniel Stirewalt, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Daniel Stirewalt

Dated: NOVEMBER 5, 1998

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script that reads "David H. Rubin". The signature is written in black ink and is positioned above a horizontal line.

David H. Rubin

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